KURT R. BONDS, ESQ. 1 Nevada Bar No. 6228 2 ALVERSON TAYLOR & SANDERS 6605 Grand Montecito Parkway, Suite 200 3 Las Vegas, Nevada 89149 Telephone: (702) 384-7000 4 efile@alversontaylor.com 5 Attorney for Defendant Trans Union LLC 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE DISTRICT OF NEVADA 9 SHANE CARLSON, Case No. 2:23-cv-00967-GMN-BNW 10 Plaintiff, JOINT STIPULATION AND ORDER 11 EXTENDING DEFENDANT TRANS 12 UNION LLC'S TIME TO RESPOND TO PLAINTIFF'S COMPLAINT TRANS UNION, LLC, EXPERIAN 13 (FIRST REQUEST) INFORMATION SOLUTIONS, INC., EQUIFAX INFORMATION SERVICES, LLC, 14 and I.Q. DATA INTERNATIONAL, INC., 15 Defendants. 16 17 COMES NOW Plaintiff Shane Carlson ("Plaintiff"), and Defendant Trans Union LLC 18 ("Trans Union"), and file this their Joint Stipulation Extending Defendant Trans Union's Time to 19 Respond to Plaintiff's Complaint. 20 1. On June 22, 2023, Plaintiff filed his Complaint. The current deadline for Trans 21 Union to answer or otherwise respond to Plaintiff's Complaint is July 17, 2023. 22 2. On July 17, 2023, counsel for Trans Union communicated with Plaintiff's 23 counsel via email regarding an extension within which to file a response to the Compliant, and 24 Plaintiff's counsel agreed to the extension. 25 3. The parties are actively discussing a potential early resolution of this case, and 26 the parties believe an extension of this nature may save waste of the parties' time and expense. 27 The additional time will allow Plaintiff and Trans Union time to fully explore such early 28 settlement discussions.

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- 4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.
- 5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including August 16, 2023. This is the first stipulation for extension of time for Trans Union to respond to Plaintiff's Complaint.

DATED: July 17<sup>th</sup>, 2023

## **ALVERSON TAYLOR & SANDERS**

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## |s| Gerardo Avalos

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## ORDER

IT IS SO ORDERED

**DATED:** 12:03 pm, July 18, 2023

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BRENDA WEKSLER UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE** 1 I hereby certify that on the 17<sup>th</sup> day of July 2023, I electronically filed **JOINT** 2 STIPULATION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S 3 TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S 4 **COMPLAINT** with the Clerk of the Court using the CM/ECF system which will then send a 5 notification of such to the following counsel of record: 6 George Haines Gia Marina ghaines@freedomlegalteam.com 7 gmarina@clarkhill.com Gerardo Avalos Clark Hill 8 gavalos@freedomlegalteam.com 3800 Howard Hughes Parkway, Suite 500 Freedom Law Firm Las Vegas, NV 89169 9 8985 S. Eastern Avenue, Suite 350 (702) 862-8300 Las Vegas, NV 89123 (702) 862-8400 Fax 10 (702) 880-5554 Counsel for Equifax Information Services, 11 (702) 385-5518 Fax LLC Counsel for Plaintiff 12 /s/ Teri Jenks 13 Employee of ALVERSON TAYLOR & SANDERS 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28